

DOCKET FILE COPY ORIGINAL

RECEIVED

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

JUL 15 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of

Amendment of the
Commission's Rules
Concerning Maritime

)
)
)
)
)

PR Docket No. 92-257

antenna power/height limitations and certify the Special Industrial Radio Service Association as the recognized coordinator.

In its comments, filed June 1, 1993, UTC urged the Commission to: (1) permit the sharing of maritime channels by I/LT licensees only; (2) not postpone this proceeding until PR Docket No. 92-235 is decided; (3) permit the voluntary use of narrowband (12.5 kHz) equipment; (4) adopt a table of mileage separations for use in coordinating I/LT and coastlines or Public Coast stations; and (5) permit competitive coordination for these frequencies.

UTC agrees with the comments expressed by the Forestry-Conservation Communications Association (FCCA) that the sharing of maritime frequencies should be authorized to increase the use of under-utilized spectrum in parts of the country.^{2/} These comments are echoed by WJG Maritel and Gulf Coast Maritel (collectively Marine Telephone) which "recognize the merit of the argument that in remote areas where there is no maritime activity, such [maritime] frequencies go unused and could be allocated to non marine use."^{3/} In fact, the need for at least

^{2/} Comments of the Forestry-Conservation Communications Association (FCCA), p. 2.

^{3/} Comments of Marine Telephone, p. 17.

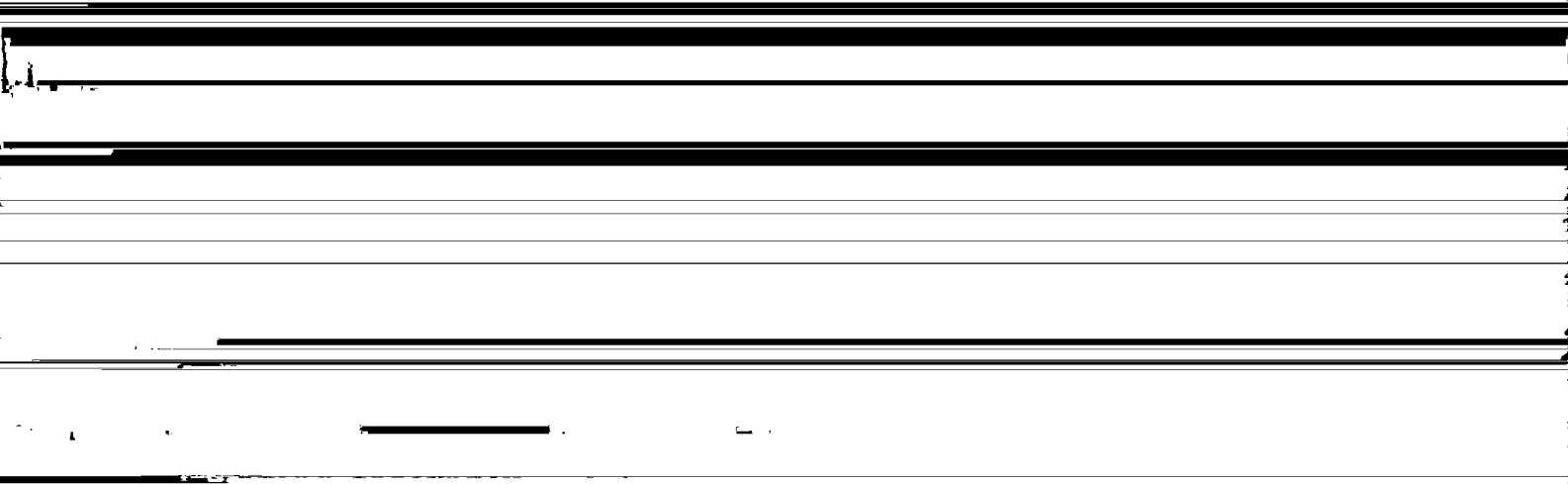
limited inter-service sharing was recognized by virtually all commenting parties.^{4/}

However, UTC urges the Commission to permit such sharing by I/LT licensees only. Limiting eligibility for sharing of maritime frequencies would help reduce potential interference by permitting the Commission to maintain better control over such sharing. Expanding eligibility, as suggested by FCCA and the Associated Public-Safety Communications Officers, Inc. (APCO), may result in an explosive increase in the number of shared frequencies and, therefore, in the potential for interference. The Commission should therefore limit sharing only to I/LT licensees, as it has proposed.

UTC strongly opposes APCO's attempt to have a portion of the maritime channels made available for sharing only between public safety users and maritime users.^{5/} APCO's request is

UTC also disagrees with APCO's request that the Commission hold this proceeding in abeyance until rules are adopted in PR Docket 92-235 ("Part 88").^{6/} Such an abeyance is unnecessary. Because these channels are not part of the problem of congestion that the Commission is attempting to address in the Part 88 proceeding, the Commission need not apply all of the Part 88 proposals to these "new" Private Land Mobile Channels. Instead, UTC urges the Commission to adopt rules for these channels based on the current Part 90 rules for the 470-512 MHz band. Moreover, insofar as I/LT users may want to use narrowband (12.5 kHz) technology, the Commission should permit the voluntary use of such equipment.

UTC disagrees with the suggestion of the Mobile Marine Radio, Inc. (MMR) that there is no reason to permit sharing by I/LT licensees because the Part 88 proposals would improve spectrum efficiency and, therefore, remove the need for additional channels. This argument overlooks the main reason



There is also no merit to MMR's argument that there is no

need for inter-service sharing by private land mobile users 7/


reasons provided by the Commission for proposing to limit the sharing of maritime channels to I/LT users is because I/LT users "commonly operate in regions where maritime channels are not used."^{2/} Thus, Marine Telephone's concerns are unfounded.


UTC supports the use of a mileage separation table for the

WHEREFORE, THE PREMISES CONSIDERED, the Utilities Telecommunications Council respectfully requests the Commission to take action in this docket consistent with the views expressed herein.

Respectfully submitted,

UTILITIES TELECOMMUNICATIONS
COUNCIL

By: 
Jeffrey L. Sheldon
General Counsel

By: 
Thomas E. Goode
Staff Attorney

Utilities Telecommunications
Council
1140 Connecticut Ave., N.W.
Suite 1140
Washington, DC 20036
(202) 872-0030

Dated: July 15, 1993